

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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OMAR WESLEY, by next friend  
BRENDA WESLEY,

Plaintiffs,

v.

Case No. 19CV0918

ARMOR CORR. HEALTH SERVS., INC., ET  
AL. ,

Defendants.

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**DEFENDANT SUZANNE WILLIAMS' EXPERT WITNESS DISCLOSURE**

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Defendant Suzanne Williams, by and through her undersigned counsel, hereby makes the following disclosures pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure regarding witnesses who may be called in the trial of this matter to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence.

**Retained Experts:**

None.

**Non-Retained Experts:**

1. **Suzanne Williams** is employed by the Wisconsin Department of Health Services as a Conditional Release Contract Specialist. She is not retained or specifically employed to provide expert testimony and her duties do not regularly involve giving expert testimony. She is a defendant in this matter. The witness did not prepare a report in this case. The subject matter and a summary of the facts and

opinions of which she may testify to are set forth in this disclosure as well as any declarations submitted in support of Defendants' Motion for Summary Judgment, which will be filed at a later date. She may testify regarding the Department of Health Services' contract with Wisconsin Community Services, Inc. (WCS), Plaintiff's Conditional Release Plan, and the allegations contained in Plaintiff's complaint. This witness can be contacted through undersigned counsel.

2. **Nicholas Wintergerst** is employed by the Wisconsin Department of Corrections as a Probation and Parole Agent. He is not retained or specifically employed to provide expert testimony and his duties do not regularly involve giving expert testimony. He is not a defendant in this matter. The witness did not prepare a report in this case. The subject matter and a summary of the facts and opinions of which he may testify to are set forth in this disclosure as well as any declarations submitted in support of Defendants' Motion for Summary Judgment, which will be filed at a later date. He may testify regarding the Plaintiff's Conditional Release Plan and the allegations contained in Plaintiff's complaint. This witness can be contacted through undersigned counsel.

3. Any person identified as a health care provider that provided health care services to the Plaintiff. It is expected that any such witness will testify in accordance with the medical records they have generated during their care and treatment of the Plaintiff.

As to any state law claims, Defendant Williams' experts reserve the privilege against providing expert opinions for Plaintiff. *See* Wis. Stat. § 907.06; *Alt v. Cline*, 224 Wis. 2d 725, 89 N.W.2d 21, 25–26 (1999).

**Rebuttal Experts:**

To the extent Plaintiff produces at trial the testimony or written opinions of any experts, and to the extent those experts do not assert any applicable privilege, Defendant Williams reserves the right to call any personnel listed in Plaintiff's records as additional experts in rebuttal. In addition to those named above, Defendant Williams reserves the right to timely name additional rebuttal experts as may be warranted by the on-going discovery in this action. Defendant Williams further reserves the right to call additional rebuttal witnesses as may be allowed in the discretion of the court based upon testimony at trial in this matter.

Dated: April 12, 2021.

Respectfully submitted,

JOSHUA L. KAUL  
Attorney General of Wisconsin

s/Brandon T. Flugaur  
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